## Caaee41144cxv-022957-JISSW Documentt30 Filed 0011/008/115 Prage1 10 f 8 3 Matthew D. Mellen (Bar No. 233350) 1 Sarah Adelaars (Bar No. 281748) Eunji Cho (Bar No. 286710) 2 MELLEN LAW FIRM 411 Borel Avenue, Suite 230 3 San Mateo, California 94402 Telephone: (650) 638-0120 4 Facsimile: (650) 638-0125 5 Attorney for Plaintiff, IGNACIO CASTILLO 6 Molly Taylor Zapala (SBN 245985) 7 Email: mzapala@reedsmith.com Alexandra C. Seibert (SBN 283008) 8 Email: aseibert@reedsmith.com REED SMITH LLP 9 101 Second Street, Suite 1800 San Francisco, CA 94105-3659 10 Telephone: +1 415 543 8700 11 Facsimile: +1 415 391 8269 12 Attorneys for Defendant BANK OF AMERICA, N.A. 13 14 UNITED STATES DISTRICT COURT 15 FOR THE NORTHERN DISTRICT OF CALIFORNIA 16 17 IGNACIO CASTILLO, an individual; Case No.: 4:14-cv-02957-JSW 18 Plaintiff, JOINT STIPULATION TO CONTINUE CASE MANAGEMENT 19 CONFERENCE; [PROPOSED] ORDER v. 20 BANK OF AMERICA, N.A., a business entity; and DOES 1 through 50, inclusive, Case Management Conference 21 Date: January 23, 2015 Defendants. Time: 11:00 a.m. 22 Crtrm.: 5, 2nd Floor 23 Trial Date: N/A 24 25 26 27

JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE

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| 1  | Plaintiff IGNACIO CASTILLO ("Plaintiff") and Defendant BANK OF AMERICA, N.A.                    |  |  |
|----|---|--|--|
| 2  | ("Defendant") (collectively Plaintiff and Defendant may be referred to as the "Parties") hereby |  |  |
| 3  | stipulate and agree as follows, subject to the Court's approval.                                |  |  |
| 4  | <u>RECITALS</u>   |  |  |
| 5  | 1.  | . WHEREAS, a case management conference is currently scheduled for January 23, 2015; |  |
| 6  | 2.  | . WHEREAS, the Parties attended a mediation on December 3, 2014 with Mediator Martin |  |
| 7  | H. Dodd, which resulted in a successful settlement;   |  |  |
| 8  | 3.  | 3. WHEREAS, the Parties have been meeting and conferring on the language of the      |  |
| 9  | Settlement Agreement and have reached an agreement;   |  |  |
| 10 | 4.  | WHEREAS, the Parties expect to fu  | lly execute the Settlement Agreement soon;           |
| 11 | <u>STIPULATION</u>  |  |  |
| 12 | 1.  | IT IS HEREBY STIPULATED AND  | D AGREED TO that the case management conference      |
| 13 |   | be continued for at least 30 days, or  | anytime thereafter that the Court deems appropriate. |
| 14 |   |  |  |
| 15 |   |  | Respectfully submitted,                              |
| 16 |   |  | MELLEN LAW FIRM                                      |
| 17 |   |  |  |
| 18 | Date:   | January 7, 2015  | By: <u>/s/ Eunji Cho</u> Eunji Cho, Esq.             |
| 19 |   |  | Attorney for Plaintiff                               |
| 20 |   |  | IGNACIO CASTILLO                                     |
| 21 |   |  | REED SMITH LLP                                       |
| 22 | Date:   | January 8, 2015  | By: <u>/s/ Alexandra Seibert</u>                     |
| 23 |   |  | Alexandra Seibert, Esq. Attorney for Defendant       |
| 24 |   |  | BANK OF AMERICA, N.A.                                |
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| 1  | [PROPOSED] ORDER  |  |  |
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| 2  | The Court, having read the above-stipulation and good cause appearing therefor, IT IS   |  |  |
| 3  | HEREBY ORDERED THAT:  |  |  |
| 4  | 1. The case management conference is continued to March 27, 2015.                       |  |  |
| 5  | The parties' joint case management conference statement shall be due on March 20, 2015. |  |  |
| 6  |   |  |  |
| 7  | IT IS SO ORDERED.   |  |  |
| 8  |   |  |  |
| 9  | Dated: January 9, 2015  |  |  |
| 10 | THE HOLDRABLE JEFFREY S. WHITE  |  |  |
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|    | JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE                                |  |  |